

**REMARKS****Claim Rejections – 35 U.S.C. §102**

Claims 1-3, 7-10, and 19-20 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,603,763 issued to Koshino (hereinafter "Koshino"). To support such rejection, Koshino must disclose every element of the invention as claimed. More particularly, "a claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). "The identical invention must be shown in as complete detail as is contained in the ... claim." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). With the above requirement in mind, Applicants respectfully submit that Koshino fails to disclose every element of the invention as specified in each independent claim.

According to the current Office Action, the Examiner indicates that [1] the Internet connection device 11 of Koshino is similar to a Packet Control Function (PCF) and [2] the packet switching device of Koshino is similar to a Packet Data Servicing Node (PDSN). *Office Action, page 2, paragraph 2*. Assuming *arguendo* that this indication is correct, Koshino is **different** from the present invention. More specifically, all three independent claims 1, 7 and 19 indicate that the **PCF is communicatively coupled between a PDSN and a mobile station**. See, e.g., *Application, Figure 2*. In contrast, the Internet connection device 11 (PCF) is **coupled between the Internet 10 and a packet switching device (PDSN) that in turn is coupled to a mobile station**. *Koshino, Figure 1*. Thus, Internet connection device 11 is **cannot be and is not** communicatively coupled between the PDSN and the mobile station.

In addition, regarding independent claims 1 and 7, they indicate that a record of unique PDSN Id numbers is **generated** at the PCF. In contrast, the Internet connection device of Koshino has a memory 106 that **stores** private IP address groups and their packet switching devices so that when the Internet connection device 11 receives an IP packet from the Internet 10, it will know where to transfer the IP packet. More specifically, "the Internet connection device 11 converts the incoming packet from the

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global IP address to the corresponding private IP address" and thereafter transfers the IP packet to the correct packet switching device since the private IP address identifies the corresponding packet switching device based on the information stored in memory 106. *Column 4, lines 24-38 and Figures 4A & 4B.* Thus, the Internet connection device 11 does **not** generate any unique PDSN Id numbers and at best only stores PDSN Id numbers. Accordingly, Koshino also fails to disclose this limitation specified in independent claims 1 and 7.

Furthermore, again regarding independent claims 1 and 7, they indicate that a PDSN is selected **in response to the number of PDSN Id numbers in the record.** As discussed above, before transferring the incoming IP packet to a packet switching device, the Internet connection device 11 of Koshino would select the proper packet switching device **based on the private IP address associated with the incoming IP packet.** Accordingly, Koshino also fails to disclose this limitation specified in independent claims 1 and 7.

Lastly, regarding independent claim 19, it indicates that "each PCF selects a first PDSN Id number for packet data communications with the first MS **in response to the first MS Id.**" In contrast and as discussed above, Koshino selects the proper packet switching device **based on the private IP address associated with the incoming IP packet.** Koshino also fails to disclose this limitation specified in independent claim 19.

Based on the above discussion, Applicants believe independent claims 1, 7 and 19 are not anticipated by and patentable distinguishable over Koshino.

Regarding claims 2-3, 8-10 and 20, they correspondingly depend from claims 1, 7 and 19 and thus their rejections are moot.

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**CONCLUSION**

Claims 1-27 are presently standing in this patent application. In view of the foregoing remarks, each and every point raised in the Office Action mailed on April 1, 2004 has been addressed on the basis of the above remarks. Applicants believe all of the claims currently pending in this patent application to be in a condition for allowance. Reconsideration and withdrawal of the rejections are respectfully requested. However, should the Examiner believe that direct contact with Applicants' attorney would advance the prosecution of the application, the Examiner is invited to telephone the undersigned at the number given below.

Respectfully submitted,



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